

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

LISA MAE JENNINGS, individually and on
behalf of all other similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No. 1:20-cv-02638-CEF

JOINT MOTION FOR CONTINUED STAY OF PROCEEDINGS

Plaintiff Lisa Mae Jennings (“Plaintiff”) and General Motors LLC (“GM”) (collectively the “Parties), jointly move to extend the stay of all proceedings for ninety (90) days, until June 1, 2025. In support, the Parties state as follows:

1. On October 26, 2023, Plaintiff filed a Renewed Motion for Class Certification (ECF Nos. 63 and 65).
2. On November 30, 2023, GM filed a Motion for Summary Judgment (ECF Nos. 75 and 76), a Renewed Motion to Exclude Opinions and Testimony of Plaintiff’s Expert Dr. Werner J.A. Dahm (ECF Nos. 70 and 71), and a Renewed Motion to Exclude Opinions and Testimony of Plaintiff’s Expert Edward M. Stockton (ECF Nos. 72 and 73).
3. As of February 28, 2025, the Parties’ motions are fully briefed and still pending before the Court. No other case deadlines have been set.
4. On December 3, 2024, the Parties requested a ninety (90) day stay, until March 3, 2025, to preserve the status quo while they explored a potential resolution in this litigation. (Dkt. No. 101.)

5. On December 4, 2024, the Court granted that stay, holding all pending motions in abeyance.

6. The Parties have since made progress towards resolution of this action, but require additional time to reach a final resolution.

7. To preserve the status quo, Plaintiff and GM jointly seek a continued stay of all proceedings, with all pending motions held in abeyance, for ninety (90) days, until June 1, 2025.

8. The Parties do not waive their respective rights to seek additional adjournments or extensions.

9. This joint motion is not and shall not be construed as a waiver of any of the Parties' jurisdictional, substantive, or procedural rights and remedies in connection with the above-captioned proceedings, all of which are hereby expressly reserved.

WHEREFORE, for the reasons set forth above, the Parties respectfully request this Court grant the motion to extend the stay of all proceedings, and hold the pending motions in abeyance until June 1, 2025.

Dated: March 3, 2025

Respectfully Submitted,

/s/ Adam J. Levitt

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2025, I electronically filed the foregoing document with the Court via CM/ECF, which will automatically send notice and a copy of same to counsel of record via electronic mail.

/s/ Justin J. Hawal
Justin J. Hawal